

# **EXHIBIT D**

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December 6, 2005

John K. Vigliotti, Esq.  
Reardon, Joyce & Akerson, P.C.  
397 Grove Street  
Worcester, MA 01605

Re: Sonia Fernandez-Production of Documents: 03-12499MLW

Dear Attorney Vigliotti,

The purpose of this letter is to respond to your letter dated November 14, 1999 and the documents you requested on Sonia Fernandez. The documents you requested on Terri Pechner-James have already been sent to you under separate cover.

1. Chelsea Health Center: Nancy Aronoff was a therapist at East Boston Neighborhood Health Center. Nancy Aronoff stated in her psychological assessment dated July 3, 1997 under Previous History: Sonia went to Chelsea Health Center's mental health department @ 6 years ago when she was in the process of ending an abusive relationship. The Plaintiff apparently stated "I went a couple of times, that was all I needed. That woman told me what would happen if I didn't end it and I got out." We do not have any of these records. The records would be more than fifteen years old at this time.

2. Nancy Aronoff, LICSW: She was a therapist at the East Boston Neighborhood Health Center. The Urgent Care that she discusses in her records is a service offered by the Health Center. We do not have any of these records.

3. Revere Counseling Center: The date of Ms. Aronoff's reference to Ms Fernandez is not clear. Revere Counseling is not a school.

4. Darlene Millman, M.D. Darlene Millman stated in her Progress Note dated February 12, 2001 that she saw the Plaintiff on July 11, 2000 for an initial note. She referred her to Elsie Parilla, LICSW for social work, scheduled an appointment but no followup. We do not have the record of the initial note; it does not appear to have been more than a referral.

5. Jason Merola, M.D. This request is confusing. It states: In his letter to Mayor Ambrosino dated March 18, 2001, Dr. Millman states that Ms. Fernandez has been under his and Darlene Millman's care over the last year for symptoms of weight loss, depression and anxiety. Dr. Millman is female. It is not clear whose letter you are addressing in this request.

6. Christopher Harmon, M.D.: Dr Harmon works at the North Suffolk Counseling Services. We are including two records-one dated August 27, 2003 and another dated July 29, 2003. The Plaintiff will request therapy records and office notes from Dr. Harmon for the period of her treatment and will forward them as soon as we receive them.

7. Blair Manning/Elsie Parilla, LICSW: Blair Manning worked for the North Suffolk Counseling Services. The Plaintiff saw her only briefly. Elsie Parilla was a social worker at Beth Israel Deaconess Medical Center Hospital. The Plaintiff obtained limited services from her. We have no records from either therapist.

8. Peptic Ulcer Disease: We do not have records regarding this condition. The one reference to this condition was made more than sixteen years ago.

9. Primary Care Physicians: Ursula Kelly, R.N.P. appears to be a nurse at East Boston Neighborhood Health Center. She is a nurse, not a primary care physician. Dr. Marcus' was a physician at Beth Israel Deaconess Hospital..

10. 1999 Injury: This incident involved an automobile accident on the job. We have no records of this accident or injury. The Plaintiff filed a report with the Defendant, City of Revere Police Department. They have all the records connected with the accident and any injury that resulted.

11. Dr. Stein: The Plaintiff has no records from Dr. Stein. Occupational Health Center and Dr. Guerrini referred the Plaintiff to Dr. Stein. These parties were retained by the Defendant, City of Revere to evaluate the Plaintiff. They retain custody and control of the records of Dr. Stein.

12. John Buress: Occupational Health and Rehabilitation, Inc. the employer of John Buress was retained by the Defendant, City of Revere to evaluate the Plaintiff. The reports of John Buress is in the custody and under the control of the Defendant, City of Revere.

13. Hearing Loss/Lead Poisoning: We do not have any records in our files that specifically detail any lead poisoning issues. These issues are mentioned only as part of early medical history that is more than thirty years old.

14. We have provided you with the records submitted to PERAC for Sonia Fernandez in response to your Request for Production of Documents. We have provided the same documents to the City of Revere, and the City of Revere Retirement Board. Plaintiff will

provide an additional copy of the records submitted to PERAC to your office as soon as a new is completed.

Sincerely,

James S. Dilday  
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